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October 4, 2011

Ex Parte

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Contributions to the Telecommunications Relay Services Fund, CG Docket No. 11-47

Dear Ms. Dortch:

On October 4, 2011, Curtis L. Groves and I spoke by telephone with Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn, to discuss the Commission's implementation of section 715 of the Communications Act of 1934, as amended. In particular, we emphasized that the statute dictates that "each interconnected VoIP service provider and each provider of non-interconnected VoIP service shall participate in and contribute to the Telecommunications Relay Services Fund." Consistent with the comments Verizon filed in this proceeding, we also discussed the statutory requirement that contributions from VoIP providers be "consistent with and comparable to the obligations of other contributors to such Fund." Finally, we discussed the ongoing need for the Commission to remain focused on ensuring that its contributions methodology is equitable and addresses ongoing marketplace changes, including requiring contributions from VoIP services that, while "free" to end-users, generate revenues as they compete with other services obligated to contribute to the Fund.

Please feel free to contact me if you have any questions.

Sincerely,

Ian Dillun

cc: Angela Kronenberg

² *Id.* (emphasis added).

¹ 47 U.S.C. § 615.

³ Comments of Verizon, CG Docket No. 11-47 (filed May 4, 2011).

⁴ 47 U.S.C. § 615.